

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MARTIN SMOLOWITZ, on Behalf of Himself : CASE NO. 03 cv 12613 RCL
And All Others Similarly Situated, :

Plaintiff, :

v. :

IBIS TECHNOLOGY CORP, :
and MARTIN J. REID, :

Defendants. :

FRED DEN, on Behalf of Himself :
And All Others Similarly Situated, :

CASE NO. 04 cv 10060 RCL

Plaintiff, :

v. :

IBIS TECHNOLOGY CORP, :
and MARTIN J. REID, :

Defendants. :

JEFFREY WEINSTEIN, on Behalf of Himself :
And All Others Similarly Situated, :

CASE NO. 04 cv 10088 RCL

Plaintiff, :

v. :

IBIS TECHNOLOGY CORP, :
and MARTIN J. REID, :

Defendants. :

**AMENDED MOTION OF MARTIN SMOLOWITZ AND GEORGE HARRISON
FOR CONSOLIDATION, APPOINTMENT OF LEAD PLAINTIFF
AND FOR APPROVAL OF LEAD PLAINTIFF'S CHOICE OF COUNSEL**

[Additional captions on the following page]

GEORGE HARRISON, on Behalf of Himself And All Others Similarly Situated,	:	CASE NO. 04 cv 10286 RCL
Plaintiff,		
v.	:	
IBIS TECHNOLOGY CORP, and MARTIN J. REID,	:	
Defendants.		
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ELEANOR PITZER, on Behalf of Herself And All Others Similarly Situated,	:	CASE NO. 04 cv 10446 RCL
Plaintiff,		
v.	:	
IBIS TECHNOLOGY CORP, and MARTIN J. REID,	:	
Defendants.		

Martin Smolowitz and George Harrison, upon their Memorandum of Law in Support of the Motion and all prior papers and proceedings herein, hereby move to amend their previously filed Motion for Consolidation of Related Cases, Appointment as Lead Plaintiffs and Approval of Their Selection of Lead Counsel to add Mark G. Forgue as a proposed lead plaintiff.

As demonstrated in the certification attached hereto as Exhibit A, Forgue purchased common stock of Ibis Technology Corp. during the Class Period, suffered estimated losses of \$2,017, is willing to serve as lead plaintiff representing the purported class, and has retained the Law Offices of Bernard M. Gross (the "Gross" firm), Wolf Haldenstein Adler Freedman & Herz LLP (the "Wolf" firm), and Shapiro Haber & Urmy LLP (the "Shapiro" firm), to represent him and the class in this action. This motion is timely in that it is filed

within 60 days after the publication of the notice of pendency required under 15 U.S.C. § 78u-4(a)(3)(i)(A).¹

WHEREFORE, for the reasons set forth above and in their previously filed memorandum of law, the Proposed Lead Plaintiffs respectfully request that the Court grant an Order: (i) consolidating the above-captioned related actions pursuant to Fed. R. Civ. P. 42(a) and 15 U.S.C. § 78u-4(a)(3)(B)(ii); (ii) appointing Smolowitz, Harrison and Forgue as Lead Plaintiffs in this action pursuant to 15 U.S.C. § 78u-4(a)(3); and (iii) approving their selection of the Gross, Wolf, and Shapiro firms as their Lead and Local Counsel in this litigation pursuant to 15 U.S.C. § 78u-4(a)(3)(B)(v).

A revised form of proposed Order is attached hereto as Exhibit B.

Dated: March 8, 2004

Respectfully submitted,

/s/ Theodore M. Hess-Mahan
Thomas Shapiro BBO #454680
Theodore Hess-Mahan BBO #557109
Shapiro Haber & Urmy LLP
75 State Street
Boston, MA 02109
Telephone: 617-439-3939
Fax: 617-439-0134

Deborah R. Gross
Robert P. Frutkin
Law Office Bernard M. Gross
1515 Locust Street, 2nd Floor
Philadelphia, PA 19102
Telephone: 215 561-3600
Fax: 215-561-3000

¹A copy of the notice is attached as Exhibit A to the proposed lead plaintiffs' previously filed memorandum of law in support of their lead plaintiff motion. The notice was published on January 7, 2004. The 60-day deadline fell on Sunday, March 7, 2004. Pursuant to Fed. R. Civ. P. 6 and Local Rule 6(a), this motion is timely filed on the first business day following the end of the 60-day deadline.

Gregory Mark Nespole
Wolf Haldenstein Adler Freeman & Herz
270 Madison Avenue
New York, NY 10016
Telephone: 212 545-4600
Fax: 212 545-4653

Law Offices of Bruce Murphy
265 Lloyds Lane
Vero Beach, Florida 32963
(772) 231-4202

Attorneys for the Proposed Lead Plaintiffs